I wish to offer my support to the counter proposal submitted by John Pavlica Jr. I wish to add that as a lawyer with an interest in broadcasting, I have serious concerns over the use of HD Radio / IBOC on the MW 530 to 1710 Mhz broadcast band. Ionospheric propagation does not limit itself to international boundaries. For many years the FCC and Industry Canada [formerly the Department of Communications] have worked closely and cooperatively to deal with nightime interference issues between our countries. I believe that the use of HD Radio / IBOC post-sunset to pre-sunrise would reduce the NIF contour of many Canadian MW stations. If this occurs, and if a satisfactory solution cannot be reached, nightime patterns of Canadian stations may have to be adjusted in order to preserve their NIF contour. Such action would further compound nightime interference concerns.

While I believe that the use of HD Radio / IBOC technology may in fact have a net benefit for MW wave groundwave reception during daylight hours, I am of the opinion that analogue MW broadcasting remains the best technology for nightime hours. To enhance perceived signal to noise ration, receive only digital processing could address at least some EMI issues on the MW band. As for sound quality, the NRSC bandwidth requirements and the AMAX receiver standards would appear to be the best option for a balance btween nightime fidelity and first, second and third adjacent channel interference. Where music programming is contemplated, or for more creative use of news / talk and sports formats, the use of CQUAM AM Stereo should be encouraged.

I request that the FCC carefully consider these comments and fully consult with Industry Canada on the issue of the potential cross border interference caused by post sunset, pre sunrise digital broadcasting in the MW broadcast spectrum in order to avoid a strain on the international relations between out two contries.

Respectfully submitted on February 24, 2004.

Philip Rafuse
5 Stewart Avenue
Stratford PE C1B 1B1
Canada